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LEAPFROG ENTERPRISES, INC., JOHN BARBOUR, and  
8 RAYMOND L. ARTHUR

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 IN RE LEAPFROG ENTERPRISES, INC.  
SECURITIES LITIGATION

Case No. 3:15-CV-00347-EMC

**CLASS ACTION**

16 This Document Relates To:

**STIPULATION AND  
~~PROPOSED~~ SCHEDULING  
ORDER**

17 ALL ACTIONS

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1           Pursuant to Civil Local Rule 7-12, the parties – lead plaintiff KBC Asset Management  
2 NV (“Lead Plaintiff”) and defendants LeapFrog Enterprises, Inc., John Barbour, and  
3 Raymond L. Arthur (“Defendants”) – by and through their undersigned counsel of record, submit  
4 the following stipulation and proposed order:

5           WHEREAS, on April 6, 2017, the Court directed the parties to complete private  
6 mediation and file an updated joint case management statement by July 6, 2017, and scheduled a  
7 case management conference for July 13, 2017 at 1:30 p.m. (Dkt. No. 123);

8           WHEREAS, on multiple occasions the Court has granted the parties’ stipulated request to  
9 continue the scheduled Initial Case Management Conference so that it was held at the same time  
10 as hearings on Defendants’ motions to dismiss (Dkt. Nos. 49, 69, 96, 99, 108);

11          WHEREAS, on May 31, 2017, the Court granted the parties’ stipulated request to extend  
12 the deadline to conduct private mediation and to file an updated joint case management statement  
13 to September 7, 2017, in light of the mediator’s schedule, and to continue the July 13, 2017 case  
14 management conference to September 14, 2017;

15          WHEREAS, the parties conducted private mediation on August 30, 2017, but were  
16 unable to reach a negotiated resolution of the action;

17          WHEREAS, lead trial counsel for Defendants plans to appear on behalf of Defendants at  
18 the next case management conference, but will be out of the country on September 14, 2017;

19          WHEREAS, the parties have conferred and agreed, subject to Court approval, that:  
20 (i) the deadline to file an updated joint case management statement should be extended to  
21 September 21, 2017; and (ii) the case management conference scheduled for September 14, 2017  
22 should be continued to September 28, 2017 at 10:30 a.m.

23          NOW, THEREFORE, the parties hereby agree and stipulate, subject to Court approval, as  
24 follows:

- 25          1. The deadline for the parties to file an updated joint case management statement is  
26 extended to September 21, 2017;  
27          2. The case management conference scheduled for September 14, 2017 is continued to  
28 September 28, 2017 at 10:30 a.m.

1  
2 DATED: July 6, 2017

3 ROBBINS GELLER RUDMAN  
4 & DOWD LLP  
5 SHAWN A. WILLIAMS  
6 WILLOW E. RADCLIFFE  
7 MATTHEW S. MELAMED

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*/s/ Matthew S. Melamed*  
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23 Co-Lead Counsel for Plaintiffs

24 DATED: July 6, 2017

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*/s/ Ryan M. Keats*  
30 RYAN M. KEATS

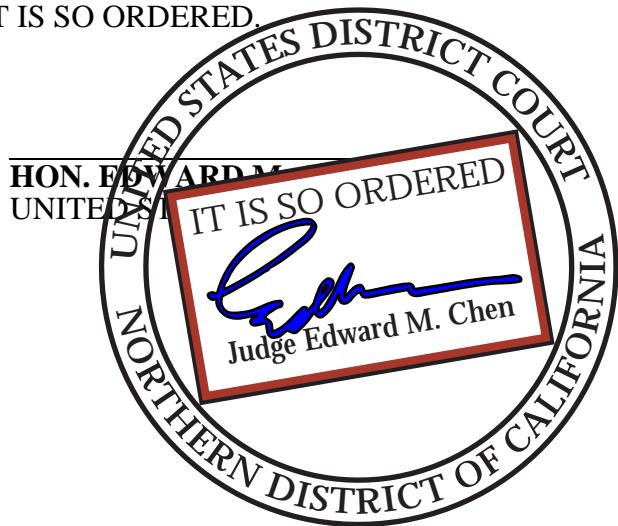
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35 Counsel for Defendants

## ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 9/5/17



## **ATTESTATION**

I, Ryan M. Keats, am the ECF User whose ID and password are being used to file this  
**STIPULATION AND [PROPOSED] SCHEDULING ORDER.** In compliance with Civil  
L.R. 5-1, I hereby attest that Matthew S. Melamed concurred in this filing.

*/s/ Ryan M. Keats*

RYAN M. KEATS